

STATE OF MAINE
OFFICE OF SECURITIES
121 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0121

IN RE:

Sequoia Investments, Inc.

CONSENT AGREEMENT
No. 13-9689-CAG

This document is a Consent Agreement authorized by 10 M.R.S.A. § 8003(5)(B) regarding the unlicensed activity of Sequoia Investments, Inc. in the State of Maine. This Consent Agreement is entered into by and among the Administrator of the Maine Office of Securities ("the Administrator"), the Maine Office of the Attorney General ("the Attorney General") and Sequoia Investments, Inc. ("Sequoia" or "the firm") (CRD# 39341), a broker-dealer with its principal place of business located at 3301 Chimney Lane, N.E., Roswell Georgia.

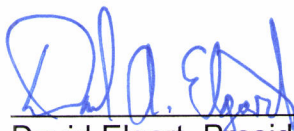
WHEREAS, the parties agree as follows:

1. At all relevant times, it has been unlawful for a person to transact business in Maine as a broker-dealer unless licensed or exempt from licensing under the Maine Uniform Securities Act (the "Uniform Act") 32 M.R.S.A. §16401.
2. Sequoia applied to be licensed as a broker-dealer in the State of Maine in February 2013.
3. In response to inquiries from Office of Securities staff, Sequoia informed the staff in November 2013 that it has one non-institutional Maine client. Sequoia further disclosed that the firm had effected six (6) securities transactions in Maine for that client between March 7, 2013 and July 25, 2013. Sequoia was not licensed as a broker-dealer in Maine when these transactions were effected. These transactions resulted in compensation of \$4,682.50.
4. In effecting the securities transactions for a Maine client, Sequoia acted as a broker-dealer when it was not licensed in Maine to do so, in violation of 32 M.R.S.A. § 16401 of the Uniform Act.
5. Sequoia has represented to the Administrator that it was not the firm's intention to violate the Uniform Act.
6. All parties desire an expeditious resolution of this matter.

NOW THEREFORE, without trial or adjudication of any issue of fact or law, and without SEQUOIA admitting or denying that its conduct violated the Maine Uniform Securities Act, it is agreed that:

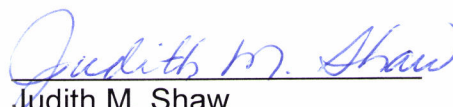
1. Sequoia will comply with all licensing and other legal requirements governing persons acting as securities broker-dealers in the State of Maine at all times from the date hereof;
2. Sequoia shall pay a civil fine in the sum of \$1,500.00, via check or checks made payable to "Treasurer, State of Maine," due at the time the signed Consent Agreement is returned to the Office of Securities; and
3. The Administrator will not take further action against Sequoia based solely upon its unlicensed status during the period preceding and including the date of execution of this Agreement, PROVIDED, however, that this paragraph applies only to the transactions previously disclosed to the Office of Securities by Sequoia.

12-16-13
Date



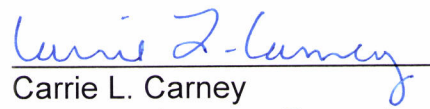
David Elgart, President
Sequoia Investments, Inc.

12/20/13
Date



Judith M. Shaw
Securities Administrator

12-20-13
Date



Carrie L. Carney
Assistant Attorney General